U.S. DISTRICT COURT
For the
EASTERN DISTRICT OF MASSACHUSETTS

ROUBEN MADIKIANS,)
        Plaintiff,)
)
v.)
)
AMERICAN AIRLINES ASSOCIATION)
    OF PROFESSIONAL FLIGHT)
    ATTENDANTS ("APFA"),   et al.,)
    Defendants,)
)
	DOCKET NO: 1:04-cv-12451-JLT

MOTION FOR EXTENSION OF TIME TO
OPPOSE DEFENDANT'S MOTION TO DISMISS

Plaintiff Rouben Madikians moves this Honorable Court pursuant to Fed.R.Civ.P. 6(b) to enter an order extending time until Monday, May 2, 2005 for Plaintiff to respond to union defendants APFA, Carrigan and Milenkovic's (hereinafter "union defendants") Motion to Dismiss filed March 31, 2005.

1.   On or about March 31, 2005, union defendants filed a motion to dismiss plaintiff's second amended complaint.

2.   Plaintiff's request is supported by good cause, as additional time is needed to fully evaluate union defendants' motion to dismiss, to conduct detailed legal analysis of union defendants' arguments, and to fully prepare an opposition to that motion to dismiss.

3.   Union defendants' counsel has assented to this motion.

4.   Inasmuch as the relief sought by the plaintiff herein is within the sound discretion of the court, no supporting memorandum of law is necessary.

WHEREFORE, plaintiff Rouben Madikians respectfully request that the Court:

Grant the plaintiff an extension of time up to and including May 2, 2005 in which to file an opposition to union defendants' motion to dismiss; and

Grant the plaintiff such further relief as the Court finds just and proper.

Respectfully Submitted,

ROUBEN MADIKIANS,
By His Attorneys,

_____/s/ David D. Nielson_____ .

David D. Nielson, Esq., BBO# 652743
Daniel J. Ciccariello, Esq., BBO# 637529
Law Office of David D. Nielson
15 Cottage Ave, Suite 301
Quincy, MA 02169
(617) 773-6866

Dated: April 4, 2005

CERTIFICATE OF SERVICE

I hereby certify that I filed the above document using the Court's Case Management/Electronic Case Filing system and have served the above document upon all counsel of record pursuant to the Administrative Procedures Governing the Filing and Service by Electronic Means on April 4, 2005.

_____/s/ David D. Nielson_____ .
David D. Nielson